

EXHIBIT 3

From: [Ferate, AJ](#)

Sent: Monday, July 25, 2022 3:24:12 PM

To: [Babchinetskaya, Izabella \(Phila\)](#); [Lester, Andy](#); [Davies, Shannon](#); [Powell, Courtney](#)

Cc: aago@lawyerscommittee.org; [Leckerman, Jason \(Phila\)](#); [Gavin, Laura \(Phila\)](#); [Swaminathan, Lisa B. \(Phila\)](#); [Jonathan Irwin](#); [Tianna Mays](#); [Woody Glass](#)

Subject: RE: Hill et al. v. Town of Valley Brook, et al. - RFPs

Sensitivity: Normal

 **EXTERNAL**

Izabella:

Thanks for the call back and the two week extension.

Warmly,

A.J. Ferate

From: Ferate, AJ

Sent: Monday, July 25, 2022 2:21 PM

To: Babchinetskaya, Izabella <BabchinetskayaI@ballardspahr.com>; Lester, Andy <alester@spencerfane.com>; Davies, Shannon <sdavies@spencerfane.com>; Powell, Courtney <cpowell@spencerfane.com>

Cc: aago@lawyerscommittee.org; Leckerman, Jason <LeckermanJ@ballardspahr.com>; Gavin, Laura <gavinl@ballardspahr.com>; Swaminathan, Lisa B. <SwaminathanL@ballardspahr.com>; Jonathan Irwin <Jonathan@wardglasslaw.com>; Tianna Mays <tmays@lawyerscommittee.org>; Woody Glass <woody@wardglasslaw.com>

Subject: RE: Hill et al. v. Town of Valley Brook, et al. - RFPs

Ms. Babcinetskaya:

I just left a voicemail a few moments ago. Due to a number of unfortunate circumstances, we would respectfully request three additional weeks to provide you with the requested discovery. I am available at your convenience at 202-486-7211 should there be a need to speak with me directly on the matter.

Warmly,

A.J. Ferate

From: Babchinetskaya, Izabella <BabchinetskayaI@ballardspahr.com>

Sent: Tuesday, July 19, 2022 10:04 AM

To: Lester, Andy <alester@spencerfane.com>; Ferate, AJ <AJFerate@spencerfane.com>; Davies, Shannon <sdavies@spencerfane.com>; Powell, Courtney <cpowell@spencerfane.com>

Cc: aago@lawyerscommittee.org; Leckerman, Jason <LeckermanJ@ballardspahr.com>; Gavin, Laura <gavinl@ballardspahr.com>; Swaminathan, Lisa B. <SwaminathanL@ballardspahr.com>; Jonathan Irwin <Jonathan@wardglasslaw.com>; Tianna Mays <tmays@lawyerscommittee.org>; Woody Glass <woody@wardglasslaw.com>

Subject: [EXTERNAL] RE: Hill et al. v. Town of Valley Brook, et al. - RFPs

[Warning] This E-mail came from an External sender. Please do not open links or attachments unless you are sure it is trusted.

Hi all,

We had previously discussed meeting about ESI protocol. In anticipation of document production, do you have some time this week to discuss the protocol and document production?

Thank you,
Izabella

From: Babchinetskaya, Izabella (Phila)

Sent: Thursday, June 23, 2022 12:50 PM

To: 'alester@spencerfane.com' <alester@spencerfane.com>; 'ajferate@spencerfane.com' <ajferate@spencerfane.com>; 'sdavies@spencerfane.com' <sdavies@spencerfane.com>; 'Powell, Courtney' <cpowell@spencerfane.com>

Cc: 'aago@lawyerscommittee.org' <aago@lawyerscommittee.org>; Leckerman, Jason (Phila) <LeckermanJ@ballardspahr.com>; Gavin, Laura (Phila) <gavinl@ballardspahr.com>; Swaminathan, Lisa B. (Phila) <SwaminathanL@ballardspahr.com>; 'Jonathan Irwin' <Jonathan@wardglasslaw.com>; 'Tianna Mays' <tmays@lawyerscommittee.org>; 'Woody Glass' <woody@wardglasslaw.com>

Subject: Hill et al. v. Town of Valley Brook, et al. - RFPs

All,

Please see attached Plaintiffs' First Request for Production of Documents.

Thank you,
Izabella

Izabella Babchinetskaya

2021 Pro Bono Honor Roll – Gold

Ballard Spahr
LLP

1735 Market Street, 51st Floor
Philadelphia, PA 19103-7599
215.864.8315 direct
215.864.8999 fax

babchinetskayai@ballardspahr.com
[vcard](#)

www.ballardspahr.com